

CUMMING FIRE & SECURITY LTD

PRIVACY NOTICE (GDPR)

Cumming Fire & Security Ltd, (CFS) is a Security / Fire System Installation, Electrical and Fire Extinguisher servicing and maintenance company, (Company Number 174138) (“we”, “us”, “our” or “CFS”). Our registered office is 10 Loch Way, Kemnay, Inverurie, Aberdeenshire, AB51 5QZ

We are committed to safeguarding your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

CFS is a “Data Controller,” which means that we are responsible for deciding how we hold and use personal information about you. We are required – under data protection legislation – to notify you of the information contained in the privacy notice.

It is important that you read this notice – together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you – so that you are aware of how and why we are using such information.

What information do we collect?

We collect your personal data because it is necessary, in relation to taking steps to enter into a contract with you and/or performance of a contract with you.

We may collect, store and use the following kind of data about you:

- **Information you give us:** This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. It includes information provided when you instigate an enquiry, request a quote or a survey, or any form of work to be done. Information is also gathered from quotations, estimates, invoices, police forms relating to key-holder details and reminder letters regarding maintenance contracts. The information you give us may include your name, address, e-mail address, phone number, bank details and personal description.
- **Information we collect about you:** With regard to each of your visits to our website, we will automatically collect the following information:
 - a. Your IP address.
 - b. Geographical location
 - c. Browser Type
 - d. Referral source
 - e. Length of visit.
 - f. Number of page views.

We do not collect any sensitive personal data about you, such information about your race, political opinions or religious beliefs. In addition, we do not knowingly collect personal data from – or direct our content towards – those under the age of 16.

How do we use your personal data?

Personal data submitted on our site will be used for the purposes specified in the privacy policy.

We may use your personal data to:

- Administer our site.
- Carry out obligations arising from any contracts entered into between you and us and to provide you with information, products and services that you request from us.
- Provide you with information about other goods and services that we offer, which are similar to those that you have already enquired about.
- Send statements and invoices to you and collect payments from you.
- Comply with our statutory and regulatory obligations.
- Deal with enquiries and complaints made by or about you relating to our site.

Disclosing your personal data to others.

We will not share your personal data with others unless:

- We are under a duty to disclose or share your personal details in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions.
- In the event that our business enters into a joint venture with, or is sold to or merged with, another business. We may then share your personal details with our new business partners or owners.
- We use third parties to carry out parts of our business activities and they require your personal details to do so. Examples are:
 - a. Our accountant for the processing of wages, collection of PAYE and NI and other related Government requirements.
 - b. The Police regarding information provided by you giving details of key holders to your property.
 - c. G4s, where you may have requested signalling for your alarm system, and the information is required to allow them to monitor the system and take appropriate action when required.
 - d. SSAIB, who regulate CFS regarding the installation of Intruder alarm systems. They require the information for their database.
 - e. SELECT, who regulate CFS regarding the installation of Electrical Systems.
 - f. HMRC regarding PAYE and NI legal requirements.
 - g. Scottish Widows regarding our company pension scheme.

Where relevant, we will require that third parties follow our data protection and privacy policy and we will require that such third parties do not use your personal details for their own business purposes, without our, as well as, your prior consent.

Cookies

Cookies are text files, placed on your computer to collect standard internet log information and visitor behaviour information. The information is used to track your use of a website and to complete statistical reports on website activity.

Where we store your personal data.

We store all of your personal files in the following manner:

- On a database within our in-house computer system.
- On a back-up hard drive updated weekly.
- Hard copy individual client files are stored within a lockable metal cabinet in a secure and alarm protected environment.

Marketing.

You have the right to ask us not to process your personal data for marketing purposes. We will inform you – before collecting your data – if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

How long do we keep your personal data for?

- We only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process personal data – and whether we can achieve those purposes through other means – and the applicable legal requirements.

How secure is my data?

- We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents and third parties who have a business need to know. They will only process your personal information on our instruction and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your rights.

Under certain circumstances, by law, you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove any personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the transfer of your personal information to another party.

If you wish to review, verify, correct or request erasure of your personal information, subject to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please write to us at 10 Loch Way, Kemnay, Aberdeenshire AB51 5QZ, or email us at cfs.ltd@dial.pipex.com.

Your right to complain.

If you have any problems with the way that we are handling your personal data, you should contact the Information Commissioner's Office (ICO). They can be contacted on 0303-123-113 Monday to Friday, between 9am and 5pm, or by email at casework@ico.org.uk. You can also visit the ICO's website at www.ico.org.uk.

Changes to our privacy policy.

We keep our privacy policy under regular review and any updates are posted on our site. This privacy policy was last updated on 30/10/2018.

Data Controller.

The data controller responsible for your personal data is Cumming Fire & Security Ltd, (Company Number 174138). Our data protection registration number is Z6793569.

If you have any questions about this privacy notice or how we handle your personal information, please contact Cumming Fire & Security Ltd on 01467-643917.

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